

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

OLLIE GREENE, Individually as the surviving §
parent of WYNDELL GREENE, SR., §
WILLIAM GREENE, as the Administrator of §
the Estate of WYNDELL GREENE, SR., and §
MARILYN BURDETTE HARDEMAN, §
Individually and as the surviving parent of §
LAKEYSHA GREENE, §
§

Plaintiffs, §
v. §

TOYOTA MOTOR CORPORATION, §
TOYOTA MOTOR ENGINEERING & §
MANUFACTURING NORTH AMERICA, §
INC., TOYOTA MOTOR SALES USA, INC., §
VOLVO GROUP NORTH AMERICA, LLC., §
VOLVO TRUCKS NORTH AMERICA, A §
DIVISION OF VOLVO GROUP NORTH §
AMERICA, LLC., STRICK TRAILERS, LLC, §
JOHN FAYARD MOVING & WAREHOUSE, §
LLC, and DOLPHIN LINE, INC. §
§

Defendants. §

CAUSE NUMBER: 3:11-cv-0207-N

JURY TRIAL DEMANDED

**DEFENDANT JOHN FAYARD MOVING & WAREHOUSE, LLC'S
OBJECTIONS TO PLAINTIFFS' DEPOSITION DESIGNATIONS**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant, **JOHN FAYARD MOVING & WAREHOUSE, LLC** (hereinafter, "Fayard Moving") and serves these, its Objections to the Deposition Designations contained in Plaintiffs' First Amended Witness List and Deposition Designations (Doc. 706):

1. Witness – Daniel Sprinkle

Deposition Page:Line	Objection(s)
17:16 – 17:20	Relevance – FRE 402 and 403
32:11 – 32:20	Relevance – FRE 402 and 403
35:8 – 37:7	Relevance – FRE 402 and 403
37:22 – 39:8	Relevance – FRE 402 and 403
40:18 – 41:6	Relevance – FRE 402 and 403
42:9 – 43:14	Relevance – FRE 402 and 403
44:23 – 45:8	Relevance – FRE 402 and 403 Personal knowledge – FRE 602
46:20 – 47:25	Relevance – FRE 402 and 403 Personal knowledge – FRE 602 Hearsay – FRE 802
49:18 – 49:24	Relevance – FRE 402 and 403 Personal knowledge – FRE 602 Expert opinion – FRE 702
51:9 – 51:11	Optional completeness – FRE 106
55:18 – 56:6	Relevance – FRE 402 and 403
86:2 – 92:8	Relevance – FRE 402 and 403 Hearsay – FRE 802

Fayard Moving hereby joins in any objections lodged by any of the other Defendant parties herein to Plaintiffs' proposed deposition designations. Fayard Moving likewise reserves its right subsequently to lodge additional objections to any deposition designations identified by Plaintiffs subsequent to those filed and served on the Court's deadline of May 23, 2014.

Respectfully submitted,

/s/ Scott W. Self
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**ATTORNEYS FOR DEFENDANT
JOHN FAYARD MOVING &
WAREHOUSE, LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 6, 2014, the foregoing Defendant John Fayard Moving & Warehouse, LLC's *Objection to Plaintiffs' Deposition Designations* was filed with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means.

/s/ Scott W. Self
MICHAEL P. SHARP
SCOTT W. SELF